

**REMARKS**

Claims 1-8, 19, 20, 31, 34 and 37-42 are pending in the present application. Claims 9-18, 21-30, 32, 33, 35 and 36 have been canceled by a previous amendment. Claims 1, 19, 20, 39 and 41 are independent. Reconsideration of this application, as amended, is respectfully requested.

**Rejections Under 35 U.S.C. §§ 102 and 103**

Claims 1, 8, 19, 20, 31 and 39 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Takahashi et al., U.S. Patent No. 6,296,896. Claims 1, 8, 19, 20, 31 and 37-41 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Zandman et al., U.S. Patent No. 6,271,060. Claim 34 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Takahashi et al. or Zandman et al. Claims 2-7 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Takahashi et al. or Zandman et al. in view of Itsuji, U.S. Patent No. 5,151,299. Claim 42 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Zandman et al. alone, or Takahashi in view of Zandman et al. These rejections are respectfully traversed.

The present invention is directed to a method of applying viscous medium on a substrate. Each of independent claims 1, 19, 20, 39 and 41 recite "said substrate being arranged for mounting of components thereon." In addition, independent claims 1, 19, 20, 39 and 41 recite "add-on jetting" or "jetting additional viscous medium" onto the substrate "prior to hardening of the screen printed viscous medium." Applicants respectfully submit that the references relied on by the Examiner fail to teach or suggest the present invention as recited in the independent claims.



At the outset, it is requested that the Examiner consider the Declaration of Dr. William Holm under 37 C.F.R. § 1.132 attached hereto. This Declaration further explains why the references relied on by the present invention fail to anticipate or render obvious the presently claimed invention.

In addition, with regard to the Takahashi et al. reference relied on by the Examiner, this reference is directed to a method for manufacturing an electron-emitting device, a method for manufacturing an electron source and a method for manufacturing an image forming apparatus. In view of this, Takahashi et al. is not directed to a method of applying viscous medium on a substrate, where the substrate is “arranged for mounting components thereon” as recited in the independent claims of the present invention. No components are mounted on the substrate of Takahashi et al. Therefore, Takahashi et al. fails to anticipate the independent claims of the present invention for at least this reason.

In the Examiner’s Office Action dated May 2, 2007, the Examiner argues that the recitation “arranged for mounting of components thereon” is in the preamble and is therefore not given any patentable weight. Applicants submit that the preamble in the present instance sets for the method that is being claimed. Specifically, the method is a method of applying viscous medium on a substrate that is arranged for mounting of components thereon. Since the preamble sets forth the method, the Examiner must consider this recitation. With regard to MPEP 2111.02 mentioned by the Examiner, it is believed that this entire section applies to apparatus claims, not method claims.

With regard to the Zandman et al. reference relied on by the Examiner, this reference is directed to a process of fabricating a chip scale surface mount package for a semiconductor



device. Referring to column 4, lines 7-12 of Zandman et al., it is disclosed that the method is directed to the manufacture of a semiconductor wafer. Therefore, no components are mounted to the substrate of Zandman et al. In view of this, Zandman et al. fails to disclose a method of applying viscous medium on a substrate, where the substrate is “arranged for mounting components thereon” as recited in the independent claims of the present invention. Therefore, Zandman et al. also fails to anticipate the independent claims of the present invention for at least this reason.

In the Examiner’s Office Action dated May 2, 2007, the Examiner argues that the Zandman et al. product will subsequently be used in manufacturing a semi-conductor package, and therefore, the Zandman et al. product is “arranged for mounting of components thereon” as recited in the independent claims of the present invention. However, the Zandman et al. product is a component that will be mounted to another substrate, for instance a wafer by the solder balls that are visible in Figures 7A and 7B. No components will be mounted to the Zandman et al. product by these solder balls. Further components may be mounted to the side of the Zandman et al. product opposite to the solder balls; however, there is nothing in Zandman et al. to confirm this. In view of this, the Zandman et al. product is not “arranged for mounting of components thereon” as in the presently claimed invention.

In addition to the above, in the present invention, the “add-on jetting” or the “jetting additional viscous medium” is performed “prior to hardening of the screen printed viscous medium.” Applicants submit that the references relied on by the Examiner also fail to disclose this aspect of the present invention.



In particular, as explained by the Examiner, Takahashi et al. discloses screen printing an insulating substrate with a conductive material to form, for example, electrodes 2 and 3 (see Figure 3A of Takahashi et al.). Additional material is then applied to the screen printed substrate by an ink jet method. Specifically, an electroconductive film forming material 32 and a decomposer 34 are applied to the screen printed substrate via nozzles 31 and 33, respectively. The substrate is then dried and baked to form an electroconductive thin film 4 to form an electrode-emitting region on the substrate (see column 3, first full paragraph and Figures 3A-3D).

Taking the above into consideration, it appears that Takahashi et al. discloses “add-on jetting” or “jetting additional viscous medium” as recited in the independent claims of the present invention. However, one having ordinary skill in the art would recognize that the film forming material 32 and the decomposer 34 are applied to the screen printed substrate after hardening of the electrodes 2 and 3. Therefore, Takahashi et al. fails to disclose jetting viscous material “prior to hardening of the screen printed viscous medium” as in the presently claimed invention.

Although it is true that the drying and baking step is performed after the jetting of medium in Takahashi et al., Applicants submit that it is inherent in Takahashi et al. that there is also hardening of the electrodes 2 and 3 after the screen printing step. Specifically, the screen printed medium that forms the device electrodes 2 and 3 is hardened before any jetting is performed.

This can be understood from a review of Takahashi et al. For example, at column 12, lines 34-37 of Takahashi et al., it is disclosed that the electroconductive film 4 (applied by



jetting) is formed after fabricating the device electrodes 2 and 3. The description "...after fabricating..." can only mean that the electrodes have been fully formed, i.e. in the rigid form achieved after hardening. This is also implied in column 12, lines 56-61, column 14, lines 32-36 and under EMBODIMENT 1 at column 24.

Applicants submit that it is also evident from Figures 19A-19E because the device electrodes 2 and 3 have the same fixed shape before and after applying the jetted viscous medium. If the device electrodes were still in a viscous condition when the additional medium is jetted thereupon, there would be at least a difference in the shape of the device electrodes, and possibly even an interaction or mixing between the two viscous media applied onto each other. Instead, there is no change at all in the shape of the device electrodes, since they have already been subjected to a hardening process. Furthermore, at column 35, lines 46-53, it is disclosed that the electrodes "formed by ... screen printing" have many porous holes. One having ordinary skill in the art would realize that such holes would only be formed after hardening of the electrodes. Therefore, this is further evidence that Takahashi et al. fails to disclose jetting of medium prior to hardening of the screen printed medium as in the presently claimed invention.

It is unlikely that one having ordinary skill in the art would be interested in applying a viscous material onto another viscous material, unless a mixing or other interaction of the two is desired. Applicants respectfully submit that this is simply not how it is done. Thus, one having ordinary skill in the art would not read Takahashi et al. as disclosing a method in which a viscous medium is applied onto a different viscous medium, as would have to be interpreted by the Examiner to meet the independent claims of the present invention. In view of this, Takahashi et al. fails to anticipate the present invention as recited in the independent claims.



In the Examiner's Office Action dated May 2, 2007, the Examiner states at page 3 "[I]t is apparent the jetted liquids are applied prior to hardening of the screen printed material because the jetted droplets connect electrodes and are then dried and baked, col. 3, 15-16." It is not understood how the fact that the drying and baking occur after the application of the jetted liquid is relevant. As mentioned above, although it is true that the drying and baking step is performed after the jetting of medium in Takahashi et al., it is inherent in Takahashi et al. that there is also hardening of the electrodes 2 and 3 after the screen printing step. Specifically, the screen printed medium that forms the device electrodes 2 and 3 is hardened before any jetting is performed. Applicants submit that the further drying and baking is conducted in order to dry the jetted liquid. The previously screen printed electrodes 2 and 3 have been previously hardened for the reasons mentioned above, and for the reasons mentioned in the attached Declaration. In view of this, Takahashi et al. fails to disclose add-on jetting "prior to hardening of the screen printed viscous medium" as recited in the independent claims of the present invention.

With regard to the Examiner's reliance on the Zandman et al. reference, Applicants submit that this reference discloses the same thing as Takahashi et al. with regard to when the jetted medium is applied. In other words, the jetted material is applied after hardening of the screen printed medium.

Specifically, referring to Figure 2B of Zandman et al., the polymer 210 is applied by, for example, screen printing, leaving pads 208G and 208S within the polymer 210. Referring to Figures 7A and 7B, solder balls 219 are then applied to the screen printed substrate. One having ordinary skill in the art would recognize that the solder balls 219 are applied after the polymer 210 has hardened at least due to that various processes that occur between the application of the



polymer 210 and the solder balls 219. For example, column 5, lines 40-64 describe laser marking the screen printed substrate, cutting the screen printed substrate and braking the screen printed substrate into strips 214. Applicants submit that it would be difficult, if not impossible, to perform these steps without prior hardening of the polymer 210. In addition, referring to Figure 3 of Zandman et al., the strips 214 are stacked one on top of the other, with the polymer 210 of one strip 214 contacting a bottom of an adjacent strip 214. It is inherent in Zandman et al. that the polymer 210 must be hardened at this time to prevent the strips from sticking together. Finally, as mentioned above, the polymer 210 retains its shape throughout the various processing steps, which would not be the case if the polymer were not in a hardened form.

In the Examiner's Office Action dated May 2, 2007, the Examiner states the following on page 4:

Clearly one disclosed option applies solder paste or other adhesive which would necessarily NOT BE HARDENED when the solder ball is subsequently applied to pads (e.g. 208 S,G) to achieve the product of figures 7A,B. The adherence of solder balls to the paste on the pads is inherently impossible if the paste is hardened prior to deposition of the solder balls.

It is not understood how the Examiner has come to this conclusion. As mentioned in the attached Declaration, it is conventional to reflow the solder ball with a laser beam. Therefore, the solder balls themselves would have sufficient adhesion to adhere to the underlying solder paste. In view of this, Zandman et al. fails to disclose add-on jetting of viscous material "prior to hardening of the screen printed viscous medium" as recited in the independent claims of the present invention.

In summary, Applicant respectfully submits that the Takahashi et al. and Zandman et al. references fail to disclose a method of applying viscous medium on a substrate that is "arranged



for mounting components thereon” as recited in the independent claims. Also, the Takahashi et al. and Zandman et al. references fail to disclose an “add-on jetting” step or “jetting additional amounts of viscous material” “prior to hardening of the screen printed viscous medium” as recited in the independent claims of the present invention. Therefore, these references fail to anticipate the independent claims of the present invention.

With regard to dependent claims 2-8, 31, 34, 37, 38 and 40, Applicants respectfully submit that these claims are allowable due to their respective dependence upon the allowable independent claims, as well as due to the additional recitations in these claims.

With regard to the Itsuji reference relied on by the Examiner, this reference has been relied on by the Examiner for its teaching of removal of screen printed material. Itsuji fails to disclose the application of viscous material prior to hardening of the screen printed viscous medium as recited in the independent claims of the present invention. Also, the modification proposed by the Examiner would not have been obvious for the reasons mentioned in the attached Declaration. Therefore, Itsuji fails to make up for the deficiencies of Takahashi et al. and Zandman et al.

In view of the above amendments and remarks, Applicants respectfully submit that claims 1-8, 19, 20, 31, 34 and 37-42 clearly define the present invention over the references relied on by the Examiner. Accordingly, reconsideration and withdrawal of the Examiner’s rejections under 35 U.S.C. §§ 102 and 103 are respectfully requested.



**CONCLUSION**

All the stated grounds of rejection have been properly traversed and/or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently pending rejections and that they be withdrawn.

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact Paul C. Lewis, Registration No. 43,368 at (703) 205-8000 in the Washington, D.C. area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

By 

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